# MORRIS AREA PARATRANSIT SYSTEM (MAPS) PUBLIC PARTICIPATION PLAN

# INTRODUCTION AND POLICY STATEMENT

The Morris Area Paratransit System (MAPS) is Morris County, New Jersey's curb-to-curb transportation service for senior citizens, people with disabilities, and those who reside in rural areas of the county. Using small buses, cars, minivans and station wagons, MAPS provides weekday transportation to various locations, including medical facilities, educational institutions and employment sites. MAPS transportation services are provided without charge to riders, although donations are accepted. Currently, the only fixed facility site for MAPS is at the Morris View Health Care Center, located at 540 West Hanover Avenue, Morris Township, New Jersey. The location is easily accessible, and can readily accommodate the elderly and disabled -- two of the main populations serviced by MAPS.

This Public Participation Plan has been prepared to ensure that MAPS services are provided in a nondiscriminatory manner, and that an opportunity for full and fair participation is offered to MAPS riders and other community members. Additionally, MAPS has examined the need for services and materials for persons for whom English is not their primary language, and who have a limited ability to read, write, speak or understand English.

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the U.S. Department of Transportation (US DOT), MAPS has an obligation to ensure that:

- Decisions regarding service changes or facility locations are made without regard to race, color, or national origin;
- The benefits of MAPS' services are shared equitably throughout the service area;
- The level and quality of MAPS' services are sufficient to provide equal access to all riders in its service area;
- No one is precluded from participating in MAPS' service planning and development process; and
- A program is in place for correcting any discrimination, whether intentional or unintentional.

To that end, MAPS is committed to providing an open and visible decision-making process to which Morris County residents have equal access. It is the policy of MAPS to actively solicit the involvement of citizens in the public decision-making process, through available means, including: public notification, media exposure, neighborhood meetings, and public hearings.

Further, it is the policy of MAPS to offer early and continuous opportunities to the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. This includes seeking out and considering the viewpoints of minority, low-income, and limited English proficiency ("LEP") populations (as well as older adults and people with limited mobility) in the course of conducting public outreach activities, consistent

with Federal Transit Administration (FTA) circular 4702.1B ("Title VI Requirements and Guidelines for Federal Transit Administration Recipients").

# **NOTICE TO THE PUBLIC**

To date, MAPS has had no lawsuits or administrative complaints brought against it alleging discrimination in any form. However, to make MAPS riders aware of its commitment to Title VI compliance, and of their right to file a civil rights complaint, MAPS will present on its official website the following posting:

MAPS gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964 and all related statutes. Title VI requires that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity for which MAPS receives Federal financial assistance.

Specifically, no person or group of persons shall be discriminated against with regard to the routing, scheduling or quality of transportation service furnished by MAPS on the basis of race, color or national origin. Frequency of service, age and quality of vehicles assigned to routes, and location of routes may not be determined on the basis of race, color or national origin.

If information is needed in another language, please contact MAPS at (973) 829-8103 or (888) 282-6277.

See Appendix A for a full description of the Title VI materials to be posted to the MAPS website at <a href="http://www.morrishumanservices.org/transportation.asp">http://www.morrishumanservices.org/transportation.asp</a>.

# **DISCRIMINATION COMPLAINT PROCEDURES**

In addition to the above, MAPS has established a process for riders to file a complaint under Title VI. Specifically, complaints may be filed by any person who believes that he or she has, individually, or as a member of any specific class of persons, been excluded from participation in, been denied the benefits of, or otherwise been subject to discrimination under any MAPS service, program or activity, and believes the discrimination is based upon race, color, national origin, gender, age, economic status, or limited English proficiency.

Complaints will be accepted in writing and may be filed with MAPS at County of Morris, Personnel Office, PO Box 900, Morristown, NJ 07963-0900. A signed written complaint must be submitted within 180 days of the alleged discriminatory act (or latest occurrence). Individuals may also file complaints directly with the US Department of Transportation (USDOT), and/or the Federal Transit Administration (FTA).

Complaints may also be filed by:

- Calling MAPS at (973) 829-8103 or (888) 282-6277; or
- Emailing MAPS at <a href="maps@co.morris.nj.us">maps@co.morris.nj.us</a>

Complaints should include, at a minimum, the following information:

- The name and address, and a telephone number where the Complainant can be reached during business hours;
- A general description of the person or class of persons injured by the alleged discriminatory acts; and
- A description of the alleged discriminatory acts in sufficient detail to enable MAPS to understand what occurred, when it occurred, and the basis of the alleged discrimination complaint (race, color or national origin).

The Complaint must be signed and dated by the person filing the Complaint or by someone authorized to do so on his or her behalf. See Appendix B for a Copy of the Complaint Form.

# Procedure Upon Receiving Complaint

MAPS has up to thirty days to investigate the Complaint. If more information is needed to resolve the case, MAPS may contact the Complainant. The Complainant has thirty days from the date of letter to send requested information to the investigator assigned to the case.

If the MAPS investigator is not contacted by the Complainant or does not receive the additional information within thirty days, MAPS can administratively close the case. A case can be administratively closed also if the Complainant no longer wishes to pursue their case.

After the investigator reviews the Complaint, one of two letters will be issued to the Complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.

An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the Complainant wishes to appeal the decision, she/he has ten days after the date of the letter or the LOF to do so.

# PUBLIC INVOLVEMENT PRINCIPLES

The following principles will be used to develop the Public Involvement Plan for MAPS projects and programs:

- When a project may affect a neighborhood or particular population, special neighborhood meetings will be scheduled early in the project planning process. Notices will be sent to organized neighborhood groups and any individual who has requested notification.
- All public notice hearings shall be written in clear, concise and understandable language and will incorporate graphics when it aides the messages. The notices will clearly be identified as a MAPS notice.

- The Public Involvement Plan will reflect MAPS' policy to provide early and continuous opportunities for the public to be involved in the identification of the impacts of proposed decisions. It will also reflect MAPS' policy to seek out the viewpoint of minority, low-income, and LEP population, as well as older adults and people with limited mobility, in the course of conducting public outreach and involvement activities.
- The Public Involvement Plan will be tailored to populations affected and the type of plan, program or service under consideration.
- Public meetings and hearings will be held in locations that are accessible to transit riders and people with disabilities, and will be scheduled at times that are convenient for members of the public.
- In light of MAPS' unique services to individuals who might otherwise have issues with mobility, transportation may be provided, upon request, to public meetings and hearings.
- Public meetings and hearings will be broadly advertised in the community and notification will be provided regarding the availability of language assistance.

# TARGETED OUTREACH TO MINORITY AND LIMITED ENGLISH PROFICIENT POPULATIONS

During development of the public participation plan and/or planning for public engagement in general, MAPS will incorporate strategies intended to promote involvement of minority and LEP individuals in public participation activities, as appropriate for the plan, project or service in question and consistent with federal Title VI regulations, Executive Order 13166 on Limited English Proficiency, and the US Department of Transportation LEP Guidance.

At a minimum, staff will hold public meetings in locations that are accessible to transit riders and people with disabilities, schedule meetings at times that are convenient for members of the public, advertise meetings in other languages where necessary, and provide notice of the availability of language assistance.

In addition, MAPS will consider implementing the following public engagement strategies to complement the minimum requirements, as appropriate to the plan, project or service:

- Using supplemental outreach strategies such as surveys regarding MAPS projects or proposed service changes.
- Partnering with community organizations to engage members of the public who are less likely to attend traditional public meetings (including LEP populations) through means such as surveys and focus groups. MAPS maintains and will update a list of current and potential future community partners.
- Attending community events and meetings of neighborhood associations, faith-based organizations, advocacy groups, and other groups to solicit feedback from the public.

For a more detailed explanation of MAPS' LEP Plan, see Appendix C.

# ADDRESSING PUBLIC COMMENTS AND INCORPORATING THEM INTO DECISION-MAKING

All comments received through the public participation plan will be given careful and thoughtful consideration. Because there are a number of different ways members of the community can comment on proposed service changes, all comments will be assembled into a single document for presentation at MAPS' governing board meetings.<sup>1</sup>

# <u>IDENTIFICATION OF STAKEHOLDERS</u>

Stakeholders are those who are either directly or indirectly affected by a plan, or by the recommendations of that plan. Those who may be adversely affected, or who may be denied benefit of a plan's recommendation(s), are of particular interest in the identification of specific stakeholders. Stakeholders can come from a number of groups including general citizens/residents, minority and low-income persons, public agencies, and private organizations and businesses. While stakeholders may vary based on the plan or program being considered, MAPS has assembled a listing of stakeholders with whom it regularly communicates through email and direct mail.

Any community organization or person can be added to MAPS' stakeholder list and receive regular communications regarding service changes by contacts MAPS at (973) 829-8103 or (888) 282-6277. Local organizations and businesses can also request that a speaker from MAPS attend their regular meeting at the same number.

#### CONTACT:

For additional information on MAPS' Title VI plan, or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency, please contact:

Ms. Lauren Burd, Director of Special Transportation Morris Area Paratransit System (MAPS) Department of Human Services PO Box 900 Morristown, NJ 07963-0900

Voice: (973) 829-8105 Fax: (973) 829-8565

email: lburd@co.morris.nj.us

<sup>&</sup>lt;sup>1</sup> See Appendix D for a table setting forth the racial demographics of MAPS' governing board.

Effective: February \_\_\_, 2014

# Appendix A

#### MAPS' Title VI Notice to the Public

The Morris Area Paratransit System ("MAPS") gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964 and all related statutes. Title VI requires that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity for which MAPS receives Federal financial assistance.

Specifically, no person or group of persons shall be discriminated against with regard to the routing, scheduling or quality of transportation service furnished by MAPS on the basis of race, color or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color or national origin.

# **MAPS' Title VI Complaint Procedure**

The Morris Area Paratransit System ("MAPS") is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities and to the delivery of equitable and accessible transportation services.

Complaints may be filed by any person who believes that he or she has, individually, or as a member of any specific class of persons, been excluded from participation in, been denied the benefits of, or otherwise subject to discrimination under any MAPS service, program or activity, and believes the discrimination is based upon race, color, national origin, gender, age, economic status, or limited English proficiency.

Complaints will be accepted in writing and may be filed with MAPS, PO Box 900, Morristown, NJ 07963-0900. A signed written complaint must be submitted within 180 days of the alleged discriminatory act (or latest occurrence). Individuals may also file complaints directly with the US Department of Transportation (USDOT), and/or the Federal Transit Administration (FTA).

Complaints may also be filed by:

- Calling MAPS at (973) 829-8103 or (888) 282-6277; or
- Emailing MAPS at <a href="maps@co.morris.nj.us">maps@co.morris.nj.us</a>

Your Complaint should include, at a minimum, the following information:

- Your name and address, and a telephone number where you can be reached during business hours;
- A general description of the person or class of persons injured by the alleged discriminatory acts;
- A description of the alleged discriminatory acts in sufficient detail to enable MAPS to understand what occurred, when it occurred, and the basis of the alleged discrimination complaint (race, color or national origin); and
- Must be signed and dated by the person filing the complaint or by someone authorized to do so on his or her behalf.

# **MAPS' Limited English Proficiency Summary**

The Morris Area Paratransit System ("MAPS") is committed to ensuring that no person is excluded from participation or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. More information on MAPS's Title VI obligation can be found in its Title VI Policy Statement.

Limited English Proficiency is a term used to describe people who do not speak English as their primary language and who also may have limited ability to read, write, or understand English.

MAPS is committed to affording individuals with meaningful access to its programs and services by:

• Advertising meetings, hearings, etc. in appropriate languages

- Requesting that participants inform us of needed accommodations in order to meet reasonable needs
- Having written materials printed in languages that meet LEP requirements
- Providing FREE of charge interpreters to verbally translate and when necessary perform sign language translation.

MAPS is also committed to assuring that resources are used to reduce the barriers that limit access to its information and services by LEP persons. For a copy of MAPS's complete Limited English Proficiency Plan please call (973) 829-8103 or email your request to maps@co.morris.nj.us.

# **Appendix B**

# Morris County Area Paratransit System (MAPS) Title VI Complaint Form

Title VI of the 1964 Civil Rights Act requires that "No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

If you believe that you were subjected to discrimination, please complete the following form. If you require assistance, we will provide it to you. The completed form can be e-mailed or mailed to the following address:

MAPS PO Box 900 Morristown, NJ 07963-0900 maps@co.morris.nj.us

2. Address:		
3. City:		
I. Telephone No. (Home): _	(Cell	):
5. Person discriminated aga	inst (if someone other than	Complainant):
Name:		
Address:		
City:	State:	Zip Code
_	best describes the reason	you believe the discriminati
place?		
	d. Gender	h. Other
	d. Gender e. Age	h. Other

the incident occurred, describe to the names of anyone else involve require more space.		nicle and d	river (if app	licable), an	d provide
require more space.					
9. Are there any witnesses to the	incident? Ple	ease provide	their contac	ct informati	on below.
Name:					
				_	
Name:Street Address:				  ::	-
Street Address:	State:		Zip Code		-
Street Address:  City:  Telephone Numbers (Home):	State:		Zip Code		-
Street Address:  City:  Telephone Numbers (Home):	State:	(Cell):	Zip Code		-
Street Address:  City:  Telephone Numbers (Home):  Name:  Street Address:	State:	_ (Cell):	Zip Code	_	-
Street Address:  City:  Telephone Numbers (Home):  Name:	State:	_ (Cell):	Zip Code Zip Code:		-
Street Address:  City:  Telephone Numbers (Home):  Name:  Street Address:  City:	State:	_ (Cell):	Zip Code Zip Code:		_
Street Address:  City:  Telephone Numbers (Home):  Name:  Street Address:  City:	State: State:	(Cell):  (Cell):	Zip Code Zip Code:		

Federal Agency	Federal Court	State Agency	
State Court	Local Agency		
11. Provide contact info	rmation for the agency or	Court that you filed the complain	nt with.
Name			
Street Address			
City, State and Zip Code _			
Telephone Number			
Please sign below. You believe support your con	•	materials or other information t	hat you
Complainant's Signature		Signature Date	

# Appendix C

#### MORRIS AREA PARATRANSIT SYSTEM

# **Limited English Proficiency [LEP] Plan**

#### I. Introduction

This Limited English Proficiency Plan has been prepared to address the responsibilities of the Morris Area Paratransit System ("MAPS") as a recipient of federal financial assistance, as those responsibilities relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including all Morris County departments and divisions receiving federal grant funds. Public Transit receives federal assistance through the U.S. Department of Transportation [U.S. DOT].

# A. Plan Summary

MAPS has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency [LEP] who wish to access services provided. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. In order to prepare this plan, the Planning Department coordinated the U.S. DOT four-factor LEP analysis which considers the following factors:

- 1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a Public Transit program, activity or service.
- 2. The frequency with which LEP persons come in contact with Public Transit programs, activities or services.
- **3.** The nature and importance of programs, activities or services provided by Public Transit to the LEP population.
- **4.** The resources available to Public Transit and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

### II. MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

# 1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a Public Transit program, activity or service.

Morris County staff reviewed the 2010 U.S. Census Report and determined that 111,000 persons in Morris County, 24.0% of the population, speak a language other than English at home. Of those, 43,920 persons have limited English proficiency; that is, they speak English less than "very well." That number translates to 9.5% of the overall population in the County. In Morris County, of those persons with limited English proficiency, 4.8% speak Spanish, 2.4% speak other Indo-European languages, 2.0% speak Asian and Pacific Island language, and .3% speak other languages.

# 2. The frequency with which LEP persons come in contact with MAPS programs, activities or services.

MAPS reviewed the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries and surveying vehicle operators. To date, MAPS has had no requests for interpreters or for translated program documents.

# 3. The nature and importance of programs, activities or services provided by Public Transit to the LEP population.

There are several educational and cultural organizations within the MAPS service area that focus on outreach to LEP individuals. Services provided by MAPS that are most likely to encounter LEP individuals are the demand response paratransit system which serves primarily senior and disabled persons.

# 4. The resources available to MAPS and overall cost to provide LEP assistance.

MAPS reviewed its available resources that could be used for providing LEP assistance, which of its documents would be the most valuable to be translated if the need should arise, and took an inventory of available organizations that could be partnered with for outreach and translation efforts. MAPS has access to over 45 Morris County employees that speak French, German, Spanish, Tagalog, Hindi, Punjabi, Urdu, Tagalog, Vietnamese, Portuguese, Russian, Polish, Arabic, Latvian, and Hungarian, and are available as interpreters as needed. There are various English as a Second Language programs within Morris County that may serve as valuable resources for outreach and translation efforts, including the Morris School District Community Adult School, the Literacy Volunteers of Morris County, the County College of Morris, the Morris County School of Technology Adult School Evening Programs, the Morris Hills School of Adult and Continuing Education, the Bethlehem Church ESL Program, Parsippany Adult and Community Education, and the Wind of Spirit Immigrant Resource Center.

# III. LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to MAPS programs and activities. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer or a message from one language into another language. MAPS will determine when interpretation and/or translation are needed and are reasonable. How the MAPS staff may identify an LEP person who needs language assistance:

- Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events.
- When MAPS sponsors an event, have a staff person greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
- Have Census Bureau *Language Identification Flashcards* available at MAPS events near the registration table. Individuals self-identifying as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist the sponsoring agency in identifying language assistance needs for future events.
- Have *Language Identification Flashcards* available at the customer service desk and easily accessible to lead drivers, supervisors, dispatchers and schedulers as needed.
- Post notice of LEP Plan and the availability of Language Identification Flashcards.
- Vehicle operators and other front-line staff, like lead drivers, supervisors, dispatchers
  and schedulers will be informally surveyed periodically on their experience
  concerning any contacts with LEP persons during the previous year.

# **A. Language Assistance Measures** - MAPS will strive to offer the following measures:

- 1. MAPS's Title VI Policy and MAPS staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English.
- **2.** There are several resources available to MAPS to accommodate LEP persons.
  - **i.** MAPS employees can be utilized for interpretative services for Spanish speakers.
  - ii. Morris County has over 45 employees that can provide interpretive services for the following languages: French, German, Spanish, Creole, Tagalog, Hindi, Punjabi, Urdu, Tagalog, Vietnamese, Portuguese, Russian, Polish, Arabic, Latvian, Hungarian, and American Sign Language.
  - **iii.** The Wind of Spirit Immigrant Resource Center made up of volunteers to assist the needs of the immigrants in the Morris County area can be accessed for interpretive assistance.
  - iv. Language assistance services available on websites.
- **3.** If a client asks for language assistance and MAPS determines that the client is an LEP person and that language assistance is necessary to

provide meaningful access, reasonable efforts will be made to provide free language assistance. If reasonably possible, MAPS will provide the language assistance in the LEP client's preferred language. MAPS has the discretion to determine whether language assistance is needed, and if so, the type of language assistance necessary to provide meaningful access.

- **4.** MAPS will periodically assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of the clients.
- 5. When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and then access language assistance at one or more of the available resources identified under Section 3.A.2.

# IV. Staff Training

The following training will be provided to MAPS staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the *Language Identification Flashcards*.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

Information will be distributed to all MAPS staff and posted on the MAPS website at <a href="http://www.morrishumanservices.org/transportation.asp">http://www.morrishumanservices.org/transportation.asp</a>

# V. TRANSLATION OF DOCUMENTS

- MAPS weighed the cost and benefits of translating documents for potential LEP groups, considering the expense of translating the documents, the barriers to meaningful translation or interpretation of busing information, the likelihood of frequent changes in documents, the existence of multiple dialects within a single language group, the apparent literacy rate in a LEP group and other relevant factors. At this time, MAPS will rely upon Morris County employees to translate documents on an as needed basis.
- MAPS does not have a formal outreach procedure in place, as of 2014. However, when
  and if the need arises for LEP outreach, Public Transit will consider the following
  options:
  - When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting

- notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.
- Bus schedules, maps, and other transit publications will be made available in an alternative language when necessary.

#### VI. FORMAL INTERPRETERS

- When necessary to provide meaningful access for LEP clients, MAPS will provide
  qualified interpreters, including any bilingual staff of Morris County, if available. At
  important stages that require one-on-one contact, written translation and verbal
  interpretation services will be provided consistent with the four-factor analysis used
  earlier.
- MAPS may require a formal interpreter to certify to the following:
  - **a.** The interpreter understood the matter communicated and rendered a competent interpretation.
  - **b.** The interpreter will maintain private information. Non-public data will not be disclosed without written authorization from the client.
  - **c.** Bilingual Morris County employees, when available, can provide limited assistance to MAPS staff and LEP clients as part of their regular job duties.

# VII. INFORMAL INTERPRETERS

- Informal interpreters may include the family members, friends, legal guardians, service representatives or advocates of the LEP client. MAPS staff will determine whether it is appropriate to rely on informal interpreters, depending upon the circumstances and subject matter of the communication. However, in many circumstances, informal interpreters, especially children, are not competent to provide quality and accurate interpretations. There may be issues of confidentiality, competency, or conflict of interest.
- An LEP person may use an informal interpreter of his or her own choosing and at their expense, either in place of or as a supplement to the free language assistance offered by MAPS. If possible, MAPS should accommodate an LEP client's request to use an informal interpreter in place of a formal interpreter.
- If an LEP client prefers an informal interpreter, after MAPS has offered free interpreter services, the informal interpreter may interpret. In these cases, the client and interpreter should sign a waiver of free interpreter services.
- If an LEP client wants to use his or her own informal interpreter, MAPS reserves the right to also have a formal interpreter present.

# VIII. OUTSIDE RESOURCES

- Outside resources may include community volunteers
- Outside resources may be used for interpreting services at public or informal meetings or events if a timely request has been made.

### IX. MONITORING

**Monitoring and Updating the LEP Plan-** MAPS will update the LEP as required by U.S. DOT. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether transit system's financial resources are sufficient to fund language assistance resources needed.
- Determine whether MAPS fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

#### X. Dissemination of the MAPS LEP Plan

- A link to the MAPS LEP Plan and the Title VI Plan will be included on the County's website, http://www.morrishumanservices.org/adv/maps.asp.
- Any person or agency with internet access will be able to access and download the plan
  from the MAPS website. Alternatively, any person or agency may request a copy of the
  plan via telephone, fax, mail, or in person, and shall be provided a copy of the plan at
  no cost. LEP individuals may request copies of the plan in translation which MAPS
  will provide, if feasible.
- Questions or comments regarding the LEP Plan may be submitted to:

Morris Area Paratransit System Department of Human Service 540 West Hanover Avenue PO Box 437 Morris Plains, NJ 07963-0900 (973) 829-8103

Website: <a href="http://www.morrishumanservices.org/transportation.asp">http://www.morrishumanservices.org/transportation.asp</a>

E-mail: maps@co.morris.nj.us

	Caucasian	Latino	African American	Asian American	Native American
MAPS Citizens Advisory Committee	100%				

Appendix D